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Attorneys for Defendant
UNITED BEHAVIORAL HEALTH

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

DAVID AND NATASHA WIT, et al.,

Plaintiffs,

v.

UNITED BEHAVIORAL HEALTH,

Defendant.

Case No. 3:14-CV-02346-JCS

**DECLARATION OF JOYCE
MCCULLOCH IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO SEAL PORTIONS OF
THEIR MOTION FOR CLASS
CERTIFICATION AND EXHIBITS
THERE TO**

Action File: May 21, 2014

Judge: Hon. Joseph Spero
Courtroom: G

1 GARY ALEXANDER, et al.,
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3 Plaintiffs,
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5 v.
6 UNITED BEHAVIORAL HEALTH,
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8 Defendant.
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Case No. 3:14-CV-05337-JCS

Action Filed: December 4, 2014

1 I, Joyce McCulloch, hereby declare as follows:

2 1. I am a Vice President with Optum Consumer Solutions Group Reporting, which is
3 an affiliate of Defendant United Behavioral Health (“UBH”) that provides services to UBH. I
4 make this declaration in support of Plaintiffs’ Administrative Motion to Seal Portions of Their
5 Motion for Class Certification (“Motion”) (ECF No. 128) and exhibits filed in support thereof.
6 Unless otherwise stated, I have personal knowledge of the matters stated in this declaration, and I
7 could and would testify competently about them if called upon to do so.

8 2. I understand that Plaintiffs have filed, as part of their **Exhibit Q**, documents that
9 they refer to as “data dictionaries” for the LINX and ARTT databases. These data dictionaries are
10 Optum and UBH’s propriety documents. For clarification, these data dictionaries are for the
11 Optum Behavioral Health data warehouse (known as the Enterprise Data Warehouse or “EDW”),
12 not for the actual LINX and ARTT source systems. These data dictionaries represent the tables
13 that my group uses to support reporting.

14 3. Reporting and analytic capability is a market differentiator for Optum and UBH
15 and, as such, access to data dictionaries for our specialized data warehouse could give
16 competitors unfair advantage. With this information, competitors could see how we structure our
17 data to support reporting and analytics. These data mapping documents could also support
18 reverse engineering that would allow competitors to gain insight into the structure of the source
19 systems, LINX and ARTT. Those source systems have, among other things, members’
20 demographic and medical information, information about the health services (including relating
21 to mental health and substance use disorders) members sought and received, and information
22 about appeals and denials.

23 4. From a security perspective, it is my understanding that these data dictionaries
24 could provide would-be hackers with a roadmap for cyber-attacks. With these documents,
25 hackers would have a better understanding of how to access Optum and UBH’s appeals and
26 denials data, which could lead to or affect the severity of security and privacy breaches.

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1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct and that this Declaration was executed this 31 day of March, 2016, at
3 Portland, Oregon.

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Joyce McCulloch